

11

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

FUNDS IN THE AMOUNT OF  
NINETEEN THOUSAND DOLLARS  
(\$19,000.00)

Defendants.

U.S. DISTRICT COURT

No.: 08 CV 2268

Judge Gettleman

Magistrate Judge Mason

Jury Trial Demanded

AUG 06 2008 T.C.  
AUG 6, 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

VERIFIED ANSWER TO VERIFIED COMPLAINT FOR FORFEITURE

NOW COMES the Defendant Martin Estrada, by and through her attorneys,  
Baltazar Mendoza of the Law Office of Baltazar Mendoza, P.C. and Answers Plaintiff's  
Verified Complaint for Forfeiture as follows:

Nature of Claim:

1. ANSWER: Defendant does not have sufficient information to admit or  
deny this allegation therefore DENIES.

Jurisdiction and Venue

2.. The Statute speaks for itself. However Defendant Martin Estrada denies  
that the Funds of \$19,000.00 are furnished or intended to be furnished in exchange for a  
controlled substance, nor are the Funds the proceeds from the sale of a controlled  
substance, nor were they monies used and intended to be used to facilitate narcotics  
trafficking, in violation of 21 U.S.C. Section 801, et seq. Defendant Martin Estrada  
denies that the FUNDS are subject to this courts Jurisdiction.

3. Defendant admits that the FUNDS were taken from him within the Northern District of Illinois answering further Defendant denies that he committed any acts giving rise to the forfeiture pursuant to Title 28, U.S.C., Sections 1355(b)(1)(A) and (d).

4. Defendant Admits that Venue is proper.

5. The Statute speaks for itself, however Defendant Denies that his Property is subject to forfeiture.

6. Defendant Denies the Allegations in paragraph 6.

7 Defendant Denies that he was going to purchase or exchange Funds for cocaine, Denies that he intended to purchase a new car but a 2007 for Explorer.

8. Defendant admits that the funds were in the denominations stated.

9. Denies.

WHEREFORE, Defendant Martin Estrada prays that this Court:

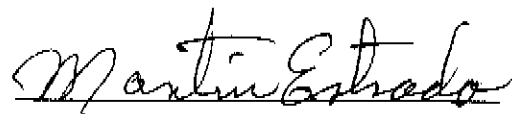
A. Denies that the Property be proceeded against for forfeiture and condemnation.

B. Deny that the defendant currency be forfeit to the United States and disposed.

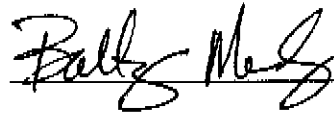
C. Order the return of Defendants property

D. Award any and all remedies this court deems just.

Respectfully submitted

A handwritten signature in cursive script that reads "Martin Estrada". The signature is written in dark ink and is positioned above the printed name.

Martin Estrada

A handwritten signature in black ink, appearing to read "Baltazar Mendoza", is written over a horizontal line.

Baltazar Mendoza

Baltazar Mendoza  
LAW OFFICE OF BALTAZAR MENDOZA, P.C.  
3701 S. Halsted Street  
Chicago, IL 60609  
Atty. No. 41166

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vi.	)	No.: 08 CV 2268
	)	
FUNDS IN THE AMOUNT OF	)	Judge Gettleman
NINETEEN THOUSAND DOLLARS	)	
(\$19,000.00)	)	Magistrate Judge Mason
	)	
	)	Jury Trial Demanded
Defendants,	)	

**VERIFICATION**

I, Martin Estrada, being first duly sworn, depose and state that I have read the attached Verified Answer to Verified Complaint for Forfeiture and know the contents thereof to be true and correct to the best of my knowledge and honest belief.

  
Martin Estrada